Remarks

The non-final Office Action dated November 2, 2007 lists the following rejections: claims 3 and 4 stand rejected under 35 U.S. C. § 112(2); claims 7-9 stand rejected under 35 U.S.C. § 102(b) over Ricketson *et al.* (U.S. Patent No. 5,307,978); and claims 1-4 and 6 stand rejected under 35 U.S.C. § 103(a) over Ricketson.

Applicant appreciates the Examiner's indication that claim 5 would be allowable if rewritten in independent form. The Office Action (on page 6) states that claim 5 recites allowable subject matter, because "Ricketson et al. only has one row of semiconductors and does not teach a system for multiple rows." The Office Action further states that "It would not have been obvious at the time of the invention to incorporate a system with even/multiple rows of semiconductors on a lead frame for wirebonding." Applicant agrees with the Office Action's characterization that the Ricketson reference does not teach a system for multiple rows of lead frames. *See, e.g.,* Figures 1-2. In contrast, the claimed invention has at least two rows of lead frames. Applicant respectfully submits that each of claims 1-4 and 6-9 are allowable for the same reasons as claim 5 because each of these claims recite at least first and second rows (*i.e.,* multiple rows) of lead frames.

Applicant submits that the § 112(2) rejection of claims 3 and 4 should be overcome because these claims do particularity point out and distinctly claim that which Applicant regards as the invention. Applicant submits that it would be clear to one of skill in the art that the claimed invention includes multiple rows of lead frames as seen in the index direction. For illustrative purposes, reference is made with respect to claim 3 to Applicant's Figure 5 (reproduced below), which shows a row of lead frames 21, 26, 29 and 34 (*e.g.,* the first row), another row of lead frames 27, 28 and 35 (*e.g.,* the second row), and an additional row of lead frames 23, 25 and 30 (*e.g.,* the further row).

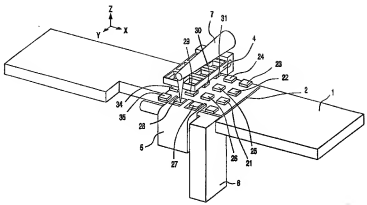

FIG. 5

The Office Action correctly asserts that the further row is located on the opposite side of the first row from the second row (*i.e.*, claim 3) and that the further row is located on the opposite side of the second row from the first row (*i.e.*, claim 4). However, the Office Action then improperly asserts that the further row precedes the first row (*i.e.*, claim 3) and that the further row follows the second row (*i.e.*, claim 4). As would be clear to the skilled artisan and as shown above in Figure 5, the further row does not proceed the first row or follow the second row, instead the first, second and further rows are parallel to each other as seen in the index direction (*i.e.*, the X direction shown above in Figure 5). In an effort to facilitate prosecution, Applicant has amended claims 1, 3-4 and 7 to expressly recite that which would have been clear to the skilled artisan (*i.e.*, that there are multiple rows of lead frames which are parallel to each other as seen in the index direction). Accordingly, Applicant requests that the § 112(2) rejection of claims 3 and 4 be withdrawn.

Applicant respectfully traverses the § 102(b) rejection of claims 7-9 and the § 103(a) rejection of claims 1-4 and 6. The Office Action acknowledges that Ricketson does not teach a system for multiple rows of semiconductor devices (*see, e.g.*, paragraph 7 on page 6 of the instant Office Action). As example of the lack of correspondence, Applicant submits that the cited portions of the Ricketson reference do not correspond to aspects of the claimed invention directed to a first clamp for clamping the leads of n adjacent lead frames of a first row of lead frames and a second clamp for clamping the leads of n adjacent lead frames of a second row that is adjacent to the first row. The cited

portions of Ricketson teach a single row of lead frames 10. *See, e.g.,* Figures 1-2. In contrast, the claimed invention has at least two rows of lead frames, with the first clamp clamping one of the rows and the second clamp clamping the other row. *See, e.g.,* Applicant's Figure 1. The Office Action acknowledges that Ricketson does not mention that jaw mechanism 40 of indexing head 16 (asserted as corresponding to the claimed second clamp) clamps a second row of lead frames. The Office Action then asserts that jaw mechanism 40 would be capable of gripping a second row (*see* the § 102(b) rejection) or that it would be a matter of "design choice" to grip a second row of semiconductors (*see* the § 103(a) rejection). However, there is no second row of lead frames for Ricketson's jaw mechanism 40 to grip since Ricketson does not teach a system for multiple rows of lead frames. Thus, Ricketson's jaw mechanism 40 cannot be capable of clamping a nonexistent second row and it would also not be a matter of "design choice" to clamp a nonexistent second row.

In view of the above, the cited portions of the Ricketson reference do not correspond to the claimed invention. Accordingly, the § 102(b) rejection of claims 7-9 and the § 103(a) rejection of claims 1-4 and 6 are improper and Applicant requests that they be withdrawn.

Applicant further traverses the § 103(a) rejection of claims 1-4 and 6 because the cited portions of the Ricketson reference do not correspond to the claimed invention which includes, for example, aspects directed to wirebonding the leads of the n lead frames of the second row to the corresponding semiconductor products while the first clamp is released. The Office Action asserts that Ricketson's upper clamp plate 34 and lower clamp plate 35 correspond to the claimed first clamp. However, Ricketson does not teach that any wirebonding is performed while upper clamp plate 34 and lower clamp plate 35 are released. *See, e.g.,* Col. 6:65 to Col. 7:27. Accordingly, the § 103(a) rejection of claims 1-4 and 6 is improper and Applicant requests that it be withdrawn.

Applicant further traverses the § 103(a) rejection of claims 3 and 4 because the cited portions of the Ricketson reference do not correspond to aspects of the claimed invention directed to a further row of lead fames. As discussed above, Ricketson does not teach a system for multiple rows of lead frames. *See, e.g.,* Figures 1-2. In contrast,

claims 3 and 4 have three rows of lead frames. Accordingly, the § 103(a) rejection of claims 3 and 4 is improper and Applicant requests that it be withdrawn.

Applicant notes that additional minor amendments have been made to claims 1 and 7 to improve readability. These amendments are not being made to overcome any of the rejections raised by the Office Action, each of which fails for the reasons discussed above.

Applicant has also added new claims 10-12, which depend from claim 7. Applicant submits that claims 10-12 are allowable over the Ricketson reference for at least the reasons discussed above.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of NXP Corporation at (408) 474-9063 (or the undersigned).

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